

Exhibit C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No.: 22-CV-22538-ALTMAN/Reid

Dominik Karnas, *et al.*, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

Mark Cuban, Dallas Basketball Limited, d/b/a
Dallas Mavericks, Robert Gronkowski, Victor
Oladipo, and Landon Cassill,

Defendants.

/

**DECLARATION OF TODD WEBB IN SUPPORT OF
PLAINTIFFS' MOTION TO CERTIFY NATIONWIDE ISSUE CLASS**

I, Todd Webb, hereby declare as follows:

1. I have personal knowledge of the facts stated herein, and if called upon as a witness, I would and could testify competently to the matters set forth herein.

2. I am a citizen and resident of the State of Florida and am over the age of 18.

3. On or about October 30, 2021, I purchased from Voyager a Voyager Earn Program Account (an "EPA") and thereafter also purchased VGX Tokens after being exposed to some or all of Cuban's and/or the Mavericks' misrepresentations and omissions regarding the Voyager Platform as detailed in the second amended complaint, including watching the October 2021 press conference with Cuban and the Mavericks.

4. As a fan of Mark Cuban, I follow him on social media and as a result of his Voyager promotions, I installed the app and used the Mavs100 promotion code from the Mavericks to make my initial purchase. I thereafter funded the account with sufficient cryptocurrency assets to meet the minimum thresholds for earning the interest Voyager offered to pay on those holdings.

5. My confidence in the Voyager Platform was primarily because of Mr. Cuban's involvement.

6. To date, I have not recovered my initial investment.

7. I am knowledgeable about the nature of this case and am ready and able to serve as a class representative in this action. I am seeking to be a class representative on behalf of all others in the United States who purchased, repurchased, invested, reinvested, deposited and/or transferred additional funds to an EPA and/or purchased, repurchased, invested, and/or reinvested in VGX Tokens, after being exposed to some or all of Defendants' misrepresentations and omissions regarding the Voyager Platform as detailed in the second amended complaint.

8. I have dedicated a significant amount of time to this matter, including reviewing the complaint and the first and second amended complaints before each was filed and authorizing their filings, searching for and producing my documents relevant to this action, providing a declaration under penalty of perjury regarding facts pertinent to this case, reviewing filings in this case, and communicating with my counsel regarding case developments. I have kept myself reasonably informed as to the status of the case.

9. I am willing to respond to reasonable discovery requests, to appear for a deposition, and to make myself available to testify at trial, if necessary.


10. I understand that as a class representative, I will have the duty to represent the interests of all unnamed class members. To my knowledge, I do not have any conflicts of interest with the absent class members or individual interests that could be deemed antagonistic to the interests of the class. I have never sought to be appointed as a class representative on behalf of a class in any other litigation.

11. Through bringing this action, I am seeking not only to secure from Defendants, for myself and all Class Members, the damages to which we may be entitled as a result of Defendants' conduct in promoting the Voyager EPAs and/or VGX Tokens and in assisting in and actively participating in Voyager's offer and sale of the EPAs and/or VGX Tokens, which are unregistered securities that were offered and sold by Voyager from the State of New Jersey, but also a declaration from the Court that the EPAs and/or VGX Tokens are, in fact, unlawfully sold unregistered securities, and recovery of attorney's fees and costs expended in this action.

12. I furthermore request that the Court appoint The Moskowitz Law Firm, PLLC and Boies Schiller Flexner LLP, to serve as Class Counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge and belief.

Executed 3/14/2024.

By:  C6FBFBFD0A7F4E1...

Todd Webb